

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES of AMERICA,

v.

Case 1:20-cr- 10307 DJC

GUSTAVO KINRYS,
Defendant.

REQUEST FOR JUDICIAL RECOMMENDATION

Defendant, Gustavo Kinrys, by his counsel, Kevin L. Barron, Esq., respectfully requests a judicial recommendation to FMC Devens so that his wife and daughters can travel from the Boston area to visit him without undue hardship. Counsel believes that Dr. Kinrys will obtain a security classification score that allows him to serve at the Devens Camp. His age, education, the absence of criminal history or Public Safety Factors and the non-violent offense of conviction will make him eligible for a camp, so long as he has less than ten years to serve.

Dated: June 4, 2024

Respectfully Submitted,
Gustavo Kinrys, defendant,
By his counsel,
/s/Kevin L. Barron
Kevin L. Barron, Esq.
P.O. Box 290533
Charlestown, MA 02129
(617) 407-6837

CERTIFICATE OF SERVICE

Counsel certifies that he has caused a true copy of this motion to be served today on counsel for all the parties through the CM/ECF system of this District as set forth in the Notice of Electronic Filing and that no party requires service by other means.

/s/Kevin L. Barron
Kevin L. Barron, Esq.